

ZEMAN & WOMBLE, ]

KEN WOMBLE  
20 VESEY STREET, RM 400  
NEW YORK, NY 10007

WWW.ZEMANWOMBLELAW.COM

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/4/2022

February 3, 2022

**Via ECF & Email**

Honorable Victor Marrero  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Acosta*, 19 CR 627 (VM)

Dear Judge Marrero:

I represent Isaiah Ward in the above-referenced matter and, with both the consent of the Government and Pretrial Services, write to request a modification of Mr. Ward's current bail conditions.

On January 10, 2022, Mr. Ward's Pretrial Services Officer requested, and this Court granted, a modification of Ward's bail conditions to include a curfew enforced by electronic monitoring (with hours to be determined by Pretrial Services). Almost immediately after, this modification had its intended effect, and Mr. Ward obtained gainful employment doing deliveries for Fresh Direct.

On February 1, 2022, Mr. Ward's Fresh Direct Route took him through and around the prohibited area of Amsterdam Avenue between West 155<sup>th</sup> and West 159<sup>th</sup> Streets (the prohibited area includes a two-block radius of the specified location). Mr. Ward has provided to Pretrial Services and to counsel his route sheet from his February 1 shift verifying that he made numerous deliveries around the prohibited area. These documents have also been provided to the Government.

As Mr. Ward has found a new job, Pretrial Services has requested that counsel request that the condition of location monitoring be removed from his bail conditions. I request, with the urging of Pretrial Services and the consent of the Government that Mr. Ward's bail conditions be returned to supervision as directed by Pretrial Services.

Additionally, to avoid the issue that arose on February 1, 2022, I request, again with the

urging of Pretrial Services and the consent of the Government, that Mr. Ward be permitted, as part of his current employment with Fresh Direct, to travel into and through the above-mentioned prohibited area if required by his employer.


Thank you for your consideration of these requests.

Respectfully submitted,

Counsel's request to modify defendant's bail conditions to remove location monitoring in order to facilitate employment as specified herein is **GRANTED**.

**SO ORDERED.**

Dated: 04 February 2022  
New York, New York

  
Victor Marrero  
U.S.D.J.

*Womble*

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ney for Isaiah Ward